

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	BANKRUPTCY CASE NO.
	§	
PROJECTOOLS, INC.	§	16-35553-H4-11
	§	
DEBTOR	§	Chapter 11

EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW PROJECTOOLS, INC., Debtor, and files this it's Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.
2. Debtor is Software Company specializing in Project –Centric EPC, Engineering, and Capital Construction Software.

3. Regions Bank, assert security interests in all of Debtor's accounts receivable, equipment, inventory and general intangibles.
4. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.
5. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its insurance, staff expense accounts, janitorial, staffing, repairs and maintenance, telephone and internet and utilities.
6. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.
7. The cash collateral at issue herein is the accounts receivable. Debtor is requesting authorization for use of cash collateral for 14 days in the amount of \$18,000.00.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure
MARGARET M. MCCLURE
State Bar No. 00787997
2 Houston Center
909 Fannin, Suite 3810
Houston, Texas 77010
(713) 659-1333
(713) 658-0334 (fax)
Margaret@mmmccclurelaw.com (e-mail)
ATTORNEY FOR DEBTOR

ProjecTools LLC**14 Day Budget**

	Week 1		Week 2		14 Day Budget
Revenue (Sales)					
Revenue (Sales)	\$	12,000.00	\$	20,000.00	\$ 32,000.00
Total Revenue (Sales)	\$	12,000.00	\$	20,000.00	\$ 32,000.00
Expenses					
Insurance	\$	1,000.00	\$	-	\$ 1,000.00
Staff Expense Accounts	\$	2,000.00	\$	2,000.00	\$ 4,000.00
Janitorial	\$	1,100.00	\$	800.00	\$ 1,900.00
Staffing	\$	2,000.00	\$	-	\$ 2,000.00
Repairs and Maintenance	\$	400.00	\$	400.00	\$ 800.00
Telephone/Internet	\$	3,000.00	\$	3,000.00	\$ 6,000.00
Utilities	\$	2,000.00	\$	-	\$ 2,000.00
Total Expenses	\$	11,500.00	\$	6,200.00	\$ 17,700.00
Net Profit					
	\$	500.00	\$	13,800.00	\$ 14,300.00

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served on all parties in interest as set out on the attached matrix either electronically or by U.S. mail or fax on November 3rd, 2016.

/s/ Margaret M. McClure
MARGARET M. MCCLURE

16-35553 ProjecTools, LLC**Case type:** bk **Chapter:** 11 **Asset:** Yes **Vol:** v **Judge:** Jeff Bohm**Date filed:** 11/01/2016 **Date of last filing:** 11/03/2016

Attorneys

Margaret Maxwell McClure

Attorney at Law

909 Fannin

Suite 3810

Houston, TX 77010

713-659-1333

713-658-0334 (fax)

margaret@mmmccclurelaw.com

Assigned: 11/01/2016

representing

ProjecTools, LLC

P.O. Box 786

Bellville, TX 77418

(Debtor)
Owen Mark Sonik

Perdue Brandon et al

1235 North Loop West

Ste 600

Houston, Tx 77008

713-862-1860

713-862-1429 (fax)

osonik@pbfcm.com

Assigned: 11/03/2016

representing

Austin County Appraisal District
(Creditor)

PACER Service Center			
Transaction Receipt			
11/03/2016 09:15:49			
PACER Login:	mm0211:2599286:0	Client Code:	
Description:	Attorney List	Search Criteria:	16-35553
Billable Pages:	1	Cost:	0.10

Label Matrix for local noticing
0541-4
Case 16-35553
Southern District of Texas
Houston
Thu Nov 3 09:16:09 CDT 2016

4099 Highway 36 North, LLC
426 Warner Road
Bellville, TX 77418-3970

American Express
P.O. Box 650448
Dallas, TX 75265-0448

Carbonite
4225 Lake Park Blvd., Suite 400
Salt Lake City, UT 84120-5577

Dell Financial Services, L.L.C.
Mail stop-PS2DF-23, One Dell Way
Round Rock, TX 78682-0001

Merchant Cash and Capital, LL
460 Park Avenue South, 10th Floor
New York, NY 10016-7315

Regions Bank
P.O. Box 840609
Houston, Texas 77284-0609

Regions Equipment Finance Corp.
1900 5th Ave. N., 24th Floor
Birmingham, AL 35203-2610

Texas Comptroller of Public Accounts (Of
P.O. Box 12548
Austin, TX 78711-2548

ProjectTools, LLC
P.O. Box 786
Bellville, TX 77418-0786

4099 Highway 36 North, LLC
P.O. Box 786
Bellville, TX 77418-0786

CTH Partners, LLLP
790 W Sam Houston Pkwy. N, #202
Houston, TX 77024-4546

Chase
P.O. Box 94014
Palatine, IL 60094-4014

Konica Minolta
21146 Network Place
Chicago, IL 60673-1211

OnRamp Datacenter
2916 Montopolis Drive, Suite 300
Austin, TX 78741-6402

Regions Bank (Elaine Flores)
901 Main Street, Suite 1400
Dallas, TX 75202-3707

Susquehanna Commercial Finance, Inc.
2 Country View Road, Suite 300
Malvern, PA 19355-1420

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

Alwin G. Morgan
426 Warner Road
Bellville, TX 77418-3970

Capital One
P.O. Box 60599
City of Industry, CA 91716-0599

Cook Legal Group
790 W Sam Houston Pkwy. N, #202
Houston, TX 77024-4546

MODEC International, Inc.
15011 Katy Freeway, Suite 500
Houston, TX 77094-0010

Regions Bank
Collateral Mgt. - P.O. Bos 12926
Birmingham, AL 35202-2926

Regions Equipment Finance Corp (E. Flore
901 Main Street, Suite 1400
Dallas, TX 75202-3707

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

Margaret Maxwell McClure
Attorney at Law
909 Fannin
Suite 3810
Houston, TX 77010-1030

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Texas Comptroller of Public Accounts
111 E. 17th Street
Austin, TX 78774

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Austin County Appraisal District	(d)ProjectTools, LLC	End of Label Matrix	
	P.O. Box 786	Mailable recipients	26
	Bellville, TX 77418-0786	Bypassed recipients	2
		Total	28